

U.S. Department of Justice
Drug Enforcement Administration

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United States
Department of Justice

Drug Enforcement Administration



**Investigative Planning/Coordination
With A. U.S.A.
Focusing On Asset Removals**

OFFICE OF TRAINING
QUANTICO, VIRGINIA

42

DUPLICAT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

TROY PAUL CRUMBLEY

Defendant.

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:
:
:
:

CR87-250A

CR. NO. 87-_____-A

SEIZURE WARRANT/AFFIDAVIT

I, John F. Harvey, having been duly sworn do hereby state that I am a special agent of the U.S. Drug Enforcement Administration, stationed in Atlanta, Georgia. During my 3 years with the DEA I have participated in over 300 investigations of individuals who have violated the narcotic laws of the United States. By and through my training and experience as a special agent of the DEA, as well as my formal education in which I obtained a juris doctorate degree from Suffolk Law School, Boston, Massachusetts, I am familiar with the federal laws governing the illegal possession and distribution of controlled dangerous substances such as marijuana and cocaine. As a result of my training, education and experience, I am also familiar with both civil and criminal forfeiture laws of the United States which relate to illegal narcotic activities. I make this affidavit in support of an application for a seizure warrant pursuant to Title 21, United States Code, Section 853(f).

1. In support of my belief that Troy Paul Crumbley is a narcotics trafficker who has derived substantial sums of monies

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from his activities in the possession and distribution of large quantities of both marijuana and cocaine, I incorporate herein and do adopt the information contained within the sworn "Application and Affidavit For Search Warrant" of Special Agent Mona Polen executed on May 29, 1987 before the Honorable John E. Dougherty, United States Magistrate. Attached hereto and incorporated herein is a certified copy of the previously mentioned application and affidavit for a search warrant of 147 La Fayette Drive, Fayette County, Riverdale, Georgia.

2. In support of my belief that there is probable cause to believe that the properties identified in Attachment A were either a) purchased with proceeds of Troy Crumbley's illegal narcotic activities; b) were used or intended to be used to commit or to facilitate the commission of the violation of Title 21; and/or c) constitute an interest in, claims against property or contractual rights affording a source of control over the continuing criminal enterprise, the following information is provided.

3. The parcels of real estate identified in paragraphs "1" and "2" of Attachment A were both negotiated and purchased by the defendant Troy P. Crumbley. Based on interviews by federal agents investigating the narcotic activities of Troy Crumbley, your Affiant has been informed that on or about July 12, 1985 Troy Crumbley paid by a combination of cash and check the balance of the purchase price of 33.41 acres of property in Henry County, Georgia (more fully described as item "2" in Attachment A). Prior to this payment Troy Crumbley had negotiated the

sale/purchase price. Further, according to the real estate agent who participated in the sale, she observed Troy Crumbley carrying a briefcase full of cash from which he paid the initial portion of the downpayment. At the closing on the 33.41 acres, although Troy Crumbley specifically paid for the property, he requested that title be placed in the name of his father, Walter B. Crumbley.

4. As to the parcel of real estate described as item "1" of Attachment A, your Affiant has been informed that following the purchase of 33.41 acres, Troy Crumbley desired to build a lake. To this end he needed more land on which a dam could be constructed. Troy Crumbley purchased an additional 9.27 acres (more fully described as item "1" in Attachment A) on or about September 13, 1985. Subsequent payments toward the purchase of the property have been made by Troy Paul Crumbley. As was the case with the 33.41 acres; the 9.27 acres were also titled in the name of Walter B. Crumbley.

5. The parcel of real estate identified as item "3" in Attachment A was purchased by Troy Crumbley on November 30, 1984. The warranty deed reflects that the defendant had title to the property placed in his name. Periodic monthly payments of \$1,168.60 were required to be made by Troy Crumbley. A search of the Clayton County Courthouse records did not reveal any default by Troy Crumbley on this parcel of real estate.

6. The real estate with the residential dwelling identified as item "4" on Attachment A was, prior to Troy Crumbley's arrest for murder, his primary residence. As noted in the paragraphs of

the search warrant affidavit contained on pages 16 through 17, 147 La Fayette Drive had been used to facilitate a narcotics transaction. Further, based on a search of that residence, a residue quantity of cocaine was seized by federal drug agents on or about May 30, 1987. Lastly, based on a confidential and reliable informant (CI#3) discussed hereinafter, Troy Crumbley purportedly concealed within his stereo speakers at 147 La Fayette Drive approximately two kilograms of cocaine. The defendant possessed this cocaine on or about March, 1987. Your Affiant believes CI#3 because the statements are against his penal interest. See paragraph 9, infra.

7. The parcel of property, together with the building thereon, identified in item 5 of Attachment A was acquired by Troy Paul Crumbley on or about April 9, 1986 from Donald Henry, Jr. Troy Crumbley paid \$25,000 cash as a downpayment and subsequently paid Mr. Henry two additional cash payments of \$25,000 and \$15,000 on April 9, 1986 and May 19, 1986, respectively. Subsequent to the purchase of this property, Troy Crumbley paid contractors approximately \$200,000 in cash to construct a residential dwelling. CI#3 has stated that Troy Crumbley informed him (CI#3) that he (Crumbley) needed to sell cocaine in order to finance the purchase of the Lake Spivey property and the construction of the home. This property is the subject of a previous seizure warrant issued in Case Number 87-327MA by United States Magistrate William L. Harper pursuant to the provisions of Title 21, United States Code, Section 881(b).

8. The parcel of property, including the building thereon, identified as item 6 of Attachment A, and the business known as "T.P.C., Inc.", including its assets both tangible and intangible, identified as item 7 of Attachment A, constitute seizable assets based on their being traced directly to that purchase by Troy Paul Crumbley from Albert Ballenger on or about November, 1985. The specific facts supporting the manner in which the defendant acquired these assets are detailed on pages eleven through fourteen, infra of the search warrant affidavit of Special Agent Mona Polen submitted in Case number 87-387MA. Further, CI#2 has stated that Troy Crumbley used monies derived from selling marijuana to buy from Albert Ballenger the property at 807 Conley Road, Atlanta, Fulton County, Georgia.

9. Confidential informant number 3 (CI#3) has entered into a cooperation agreement with the government. Pursuant to that agreement, CI#3 has entered a guilty plea to a violation of Title 21, United States Code, Section 846, conspiring with others to possess with the intent to distribute cocaine. In addition to pleading guilty, CI#3 has agreed to testify truthfully before grand and petit juries. CI#3 has not been sentenced and is exposed to being incarcerated up to and including twenty years. In exchange for his/her guilty plea and agreement to testify truthfully, the government has agreed a) not to use CI#3's statements implicating him/her (assuming the statements to be truthful) against CI#3 and b) recommend to the sentencing Court that CI#3's sentence not exceed five years. Should CI#3 provide false statements and/or testimony, then the government may use such

information against CI#3 in additional prosecutions and may seek the maximum penalty against CI#3 for his/her current guilty plea.

10. Your Affiant has interviewed CI#3. Based on statements by CI#3 your Affiant knows that the personal property identified as item number 9 of Attachment A was used to facilitate Troy Paul Crumbley's narcotic activities. Specifically, the defendant directed employees of Panama Package Liquor Store to receive at the store on behalf of the defendant monies owed Troy Crumbley for the sale of marijuana and/or cocaine. Further, on certain occasions through telephonic contact with the defendant at the store, arrangements would be made for future purchases by CI#3 and others of marijuana. These transactions occurred from before 1985 through and into 1987.

11. CI#3 further informed your Affiant that at the business known as Desparado's identified more fully as item 10 of Attachment A, negotiations would occur often for the purchase and/or sale of narcotic controlled substances, including marijuana and cocaine. Further, CI#3 has stated that he/she has obtained/delivered controlled substances from the premises and adjacent parking lot of Desparado's located at 5025 Jonesboro Road, Forest Park, Georgia. Your Affiant believes CI#3 because in addition to the information being against CI#3's penal interest, other witnesses interviewed by your Affiant have confirmed that narcotic transactions did occur at Desparado's and Panama Package Liquor Store.

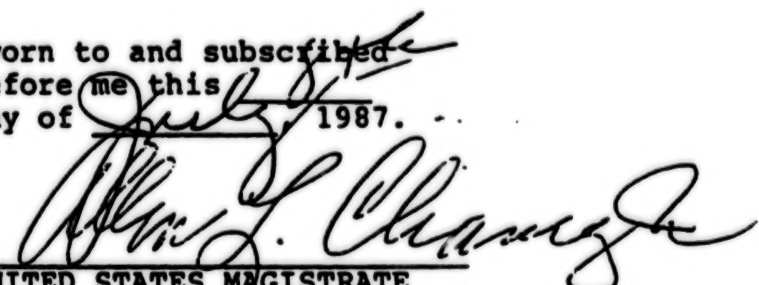
12. During the most recent weeks, efforts have been undertaken by Troy Paul Crumbley to dispose of properties subject to

seizure by the government. Specifically, the defendant has currently placed on the market the residential dwelling located at 147 La Fayette Drive, Riverdale, Georgia. The government has received information that the residence is "under contract" and that closing may be imminent. Further, employees of Desparado's have been interviewed. Based on their statements to federal agents, Troy Paul Crumbley has transferred stock in Troy P. Crumbley and Associates, Inc. to others. Your Affiant also notes that the defendant recently sold the Conley Road Spur Station. It is the opinion of your Affiant that the defendant is endeavoring to liquidate his assets.

WHEREFORE, based on the above and foregoing information your Affiant believes there is sufficient probable cause to issue a seizure warrant for each of the properties described in Attachment A.


JOHN F. HARVEY
SPECIAL AGENT, U. S. DRUG
ENFORCEMENT ADMINISTRATION

Sworn to and subscribed
before me this July 8th
day of July, 1987.


UNITED STATES MAGISTRATE

ATTACHMENT A

1. All that tract or parcel of land lying and being in Land Lot 197 of the 2nd District of Henry County, Georgia, being 9.27 acres per plat of Joe Rowan, Jr., Henry County Surveyor, dated August 27, 1985.
2. All that tract or parcel of land lying and being in Land Lots 188, 189 and 197 of the 2nd District, Henry County, Georgia and being more particularly described as 33.41 acres as shown on a plat drawn by Joe Rowan, Jr., for Wiley Brown and dated July 13, 1985. Frontage is shown as being 963.54 feet on Peeksville Road.
3. All that tract or parcel of land lying and being in Land Lot 212 of the 12th District of Clayton County, Georgia, being 0.95 acres as shown on a plat of survey by Lewis Hurd Surveyors for Albert Wilkerson dated November 5, 1985.
4. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 219 of the 13th District of Fayette County, Georgia, and being Lot 24, Block A of Unit Three of La Fayette Estates Subdivision, as per plat recorded in Plat Book 7, Page 195, Fayette County Records; said property being located at 147 La Fayette Drive, Riverdale, Georgia.
5. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 5 of the 6th District of Clayton County, Georgia, being Lot 30 Block A, Section I as shown on a plat of Lake Spivey Estates, said plat being recorded in Plat Book 7, page 83, Clayton County Records; said location of property being 2520 Emerald Drive, Jonesboro, Clayton County, Georgia.
6. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 32 of the 14th District of Fulton County, Georgia, containing 0.83 acres and designated "Parcel I" on that certain survey for Citizens and Southern National Bank by Delta Engineers and Surveyors, Inc., dated September 25, 1979; said location of property being 807 Conley Road, Atlanta, Fulton County, Georgia.
7. All that business, including cash, stocks and bonds, if any, and choses in action such as notes receivable, of "T.P.C., Inc.," represented by Troy Paul Crumbley to be a Georgia Corporation; said business shall include but not be limited to a) that downpayment of \$120,000.00 made by Woo Won Hwang and Young Soon Hwang for the purchase of that business known as the "Conley Road Spur Station" located at 807 Conley Road, Atlanta, Fulton County, Georgia; b) that promissory note executed on or about April 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$20,000 being due and payable to "T.P.C., Inc."; c) that promissory note executed on or about

July 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$160,000.00, payable in monthly installments of \$2,114.00 beginning May 20, 1987; d) that "Security Agreement" executed by Woo Won Hwang and Young Soon Hwang dated April 20, 1987 securing the two promissory notes identified previously; said notes and security agreement being created as part and parcel of the sale by Troy Paul Crumbley, "President" of a purported Georgia corporation, known as "T.P.C., Inc.," of the business known as the "Conley Road Spur Station."

8. That chose in action identified by that promissory note executed on June 13, 1986 by Fritz Albrecht for the principal sum of \$10,000.00 together with interest due and payable to Troy Paul Crumbley.
9. All that personal property, both tangible and intangible, specifically including inventory, currency, equipment, accounts receivable, etc. of that business known as Panama Package Liquor Store owned and operated by Party Package, Inc., and located at 4841 Jonesboro Road, Forest Park, Fulton County, Georgia.
10. All that business enterprise owned and operated by T. P. Crumbley and Associates, Inc., doing business as Desporado's and located at 5025 Jonesboro Road, Forest Park, Georgia, said business shall include but not be limited to said stock of the corporation, as well as its assets including leaseholds, fixtures, licenses, accounts receivable, bank accounts, etc.

United States District Court

NORTHERN

DISTRICT OF GEORGIA

In the Matter of the Search of

(Name, address or brief description of person or property to be searched)

147 La Fayette Drive, Fayette County,
Riverdale, Georgia a single family
residential cedar and stone dwelling
with dark stain on the cedar

APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT

CASE NUMBER: 87-287MA

I, Mona Polen being duly sworn depose and say:I am a(n) Special Agent, Drug Enforcement Administration and have reason to believe
Official Titlethat ☐ on the person of or ☒ on the premises known as (name, description and/or location)

147 La Fayette Drive, Fayette County, Riverdale, Georgia a single fam.
residential cedar and stone dwelling with a dark stain on the cedar

In the Northern District of Georgia

there is now concealed a certain person or property, namely (describe the person or property)

See attached Affidavit and Schedule A.

which is (give alleged grounds for search and seizure under Rule 41(b) of the Federal Rules of Criminal Procedure)

that evidence of narcotic trafficking (See attached Affidavit)

in violation of Title .21 United States Code, Section(s) 841, 846, 848, 952, 963The facts to support the issuance of a Search Warrant are as follows:
See Affidavit.

Continued on the attached sheet and made a part hereof.

☒ Yes ☐ NoMona Polen
Signature of Affiant MONA POLEN

Sworn to before me, and subscribed in my presence

29 May 1987
DateJOHN E. DOUGHERTY
U.S. MAGISTRATE

Name and Title of Judicial Officer

at

Atlanta, GA
City and StateJohn E. Dougherty
Signature of Judicial Officer

A F F I D A V I T

I, Mona Polen, having been duly sworn do hereby state and depose as follows:

That I am a Special Agent of the Justice Department's Drug Enforcement Administration, Atlanta, Georgia and have been a federal narcotics enforcement officer for approximately 7 years. Prior to my appointment as a Special Agent of the DEA, I was employed as a police officer for 9 years with the Miami Police Department Miami, Florida. During my tenure as a law enforcement officer, I have worked on at least 500 drug investigations, and have worked in an undercover capacity purchasing Controlled Dangerous Substances, including cocaine hydrochloride, a Schedule II controlled substance (21 U.S.C. §812). I have participated in the execution of over 100 search and seizure warrants and know from personal experience that execution of such warrants has resulted in the seizure of large quantities of Controlled Dangerous Substances (CDS), (cocaine, marijuana, heroin, etc.) packing implements and other paraphernalia involved in the distribution of CDS; large amounts of U.S. Currency, other assets of wealth (including jewelry), ledger books, bank records, telephone books, receipts, airline tickets, drug customer lists, and other documents relating to the transportation, ordering, purchasing and distributing of Controlled Dangerous Substances.

That based upon my training, experience, and participation in other financial investigations involving large amounts of cocaine and/or other CDS I know:

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a. That drug traffickers very often place assets in names other than their own (nominee names) to avoid detection of those assets by law enforcement agencies;

b. That drug traffickers very often place assets in corporate entities in order to avoid detection of those assets by law enforcement agencies;

c. That even though these assets are in nominee names, drug traffickers continue to use these assets by exercising dominion and control over them;

d. That large scale drug traffickers maintain on hand large amounts of U.S. Currency in order to finance their on going drug business;

e. That cocaine/marijuana and/or other CDS traffickers maintain books, records, receipts, notes, ledgers, airline tickets, money orders, and other documents relating to the transportation and distribution of Controlled Dangerous Substances; that cocaine and/or other CDS traffickers commonly "front" (provide cocaine and/or other CDS on consignment) cocaine and/or other CDS to their clients; that the aforementioned books, records, receipts, notes, ledgers, etc. are maintained where the cocaine and/or other CDS traffickers have ready access to them.

f. That it is common for large scale cocaine/marijuana traffickers to secrete contraband, proceeds of drug sales, and records of drug transactions in secure locations within their residences and/or their business to conceal them from law enforcement authorities.

g. That persons involved in large scale drug trafficking conceal in their residences and businesses a cash of drugs, large amounts of currency, financial instruments (including stocks, bonds, certificates of deposit, etc.), precious metals, jewelry, automobile titles, other items of value and/or proceeds of drug transactions, including works of art and evidence of financial transactions relating to the obtainment and secretment of large sums of money acquired from engaging in narcotic trafficking activities;

h. That when drug traffickers amass large proceeds from the sale of drugs, the drug traffickers attempt to legitimize these profits; i.e. "launder"; that to accomplish these goals, drug traffickers many times utilize domestic and foreign banks and or financial institutions with their attendant services, including sales of securities, cashier's checks, money drafts, letters of credit, etc.; that other entities used to "launder" monies include brokerage houses, real estate firms, shell corporations and purported legitimate business fronts;

i. That cocaine is not commonly manufactured within the United States; that it is common practice for large scale cocaine traffickers to travel to purchase and distribution areas to facilitate their trafficking; that after purchasing cocaine, that cocaine traffickers will transport or cause to be transported cocaine to areas in which they will distribute the cocaine; and that the methods of transportation include, but are not limited to commercial airlines, ocean going vessels, private airplanes,

rental and private automobiles, and government and contract mail carriers;

j. That cocaine/marijuana and other CDS traffickers commonly maintain addresses or telephone numbers in books and documents which reflect names, addresses and/or telephone numbers of their associates in the trafficking organization;

k. That drug traffickers take or cause to be taken photographs of themselves, their associates, their property and their product, and that the photographs are usually maintained at the residences and/or businesses of the traffickers;

l. That the courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, in particular trafficking in Controlled Dangerous Substances (See United States v. Barnes, 604 F.2d 121, 147 (2d Cir., 1979);

m. That based on my training and experience, I know that drug traffickers commonly have in their possession, (that is on their persons, at their residences and/or their businesses), firearms, including but not limited to handguns, pistols, revolvers, rifles, shotguns, machine guns and other weapons; that said firearms are used to protect and secure a drug traffickers property which may include, but is not limited to, narcotics, jewelry, narcotic paraphernalia, books, records, U.S. Currency, etc. That the courts have recognized that weapons are tools of a narcotic trafficker's trade and that it is reasonably foreseeable that conspirators involved in a large scale narcotics conspiracy will carry, possess and use weapons (See, United States v. Alvarez, 755 F.2d 830, 848 (11th Cir. 1985).

The following information is provided in support of an application for a search warrant of the residence of Troy Paul Crumbley located in Fayette County, Georgia.

DEBRIEFING OF TROY P. CRUMBLEY

On February 17 and 27, 1987, Troy P. Crumbley was voluntarily debriefed by DEA agent Jack Harvey and others in the Atlanta, Georgia area. Troy Crumbley provided details of certain of his drug transactions.

Crumbley stated that he wanted to cooperate with DEA in order for a marijuana case to be made against Herbert Benefield. Crumbley stated that he would actively cooperate in an undercover investigation of Benefield only if certain conditions would be met by DEA. At the second meeting, Crumbley handed S/A Harvey a type-written sheet listing those conditions, which concerned immunity, financial payment, relocation, government purchase of Crumbley's properties and businesses, and arrangements for the acquisition of a boat captain's license for Crumbley. In the aforementioned meetings, Crumbley stated that he was "retiring" from the drug business; that he was tired of being harassed by law enforcement; and that he wished to fulfill his recently deceased father's desire that he stop dealing in illegal drugs. Crumbley stated that he earns \$5000.00 per week "honest money" from his three businesses, a Spur convenience and liquor store, Panama Package liquor store, and Desperado's nightclub, all located in Forest Park, Georgia. Crumbley stated that he has known Herbert Benefield for two years and that Benefield is his marijuana source. Crumbley related that Benefield recently

offered to sell Crumbley his Mexican marijuana connection. According to Crumbley, Benefield received an offer of \$200,000.00 for that connection from an individual in the Atlanta area named Brian. Benefield turned down that offer because he wanted "clean" money in the form of bank checks made out to his sister and brother-in-law, Karen and Glen Kaiser, who raise and sell horses in Louisiana. Crumbley stated that he then agreed to pay a total of \$65,000.00 in three bank checks made out to the Kaisers, purportedly for the purchase of three horses. Crumbley stated that Benefield assured Crumbley that Crumbley would make at least that much money back in the first load Crumbley would work with that connection.

Crumbley related that he then flew to Houston, Texas sometime in January of 1987 to meet Benefield and the connection. Crumbley stated that he met Benefield and was introduced to a third person, an unnamed Mexican, said by Benefield to be a brother of the connection. Crumbley stated that he did not have an opportunity to discuss business with that individual and never met with anyone else in Houston. Crumbley stated that he returned to Atlanta very dissatisfied with what had occurred in Houston. Crumbley stated that he subsequently expressed his displeasure to Benefield and then became involved in a dispute over money with Benefield. Crumbley stated that Benefield then began seeing Crumbley's girlfriend. Crumbley related that Benefield most recently contacted him in mid-February and acted as if there were no differences between them. According to

Crumbly, Benefield asked if he was "ready to work" and Crumbly responded that he was and would wait to hear back from Benefield.

Crumbly related that ~~his normal~~ routine with Benefield would go as follows: Crumbly and Benefield would agree on an amount of marijuana to be purchased by Crumbly, never less than three hundred pounds, usually in the area of a thousand pounds, Crumbly would then be told by Benefield to meet Benefield somewhere in Texas, usually Austin or Houston, and stay in a designated motel, normally a Holiday Inn, Airport Inn or Quality Inn. Crumbly would sometimes but not always be picked up at the airport by Benefield and be driven to his motel. Before flying to Texas, Crumbly would make arrangements for his drivers, always females, to rent cars and drive them from Atlanta to the same motel in Texas. The rented cars would usually be Mercury Marquis, which have trunks capable of carrying up to three hundred pounds of marijuana. Crumbly would pay each of his drivers \$2,000.00, \$500.00 for road expenses and \$1,500.00 for the service. Once in Texas, Crumbly and his drivers would wait to hear from Benefield. Sometimes the waiting period would last for two or three days. The rented cars would be parked in the motel lot. When Benefield did meet with Crumbly, Crumbly would hand Benefield the keys to the rented cars. Benefield and his drivers would leave with the cars and then return to the motel in approximately two hours with the same cars, the trunks of each car fully loaded with marijuana. Crumbly would then hand Benefield an envelope containing a previously agreed upon amount of cash and Benefield would return the car keys to Crumbly.

Crumbly's drivers would then return the marijuana to Atlanta and Crumbly would fly back to Atlanta, never having touched or even seen any marijuana in Texas. The marijuana, always "high quality sinsemilla" would then be distributed by Crumbly's people in Atlanta at a price of at least \$1,300.00 per pound after having been purchased by Crumbly in Texas at a price of \$800.00 per pound.

Crumbly related that the reason ~~he~~ would use several cars rather than one larger vehicle was that he didn't want to risk losing the entire load by one vehicle being stopped on the highway by police. Crumbly then reached out and knocked on wood, saying to S/A's Bachman and Harvey, "I've never lost a load." Crumbly stated that there is more money to be made in marijuana than in cocaine because sellers of marijuana are less apt to become addicted to their product and thereby eat into the profit to be made. Crumbly also stated that more women than men use marijuana, although not many people are aware of that fact. Crumbly stated that he would cooperate in working a case against Benefield and Benefield's Texas suppliers. Crumbly insisted that he would not allow for any of his own drivers and other underlings in Georgia to be arrested. Crumbly stated that he himself was responsible for those people being in the business and he would not allow for them to be arrested as a result of his cooperation with law enforcement. Crumbly related that the smallest marijuana load he had ever worked in the aforementioned manner was three hundred pounds, purchased for \$250,000.00.

Crumbley stated that the last marijuana deal he worked with Benefield occurred on March 22, 1986 and marked a departure from the normal routine. On that occasion, Crumbley met with Benefield and other unidentified individuals at a Waffle House on Holcomb Bridge Road off Georgia Highway 400 sometime after dark. A yellow Ryder rental truck subsequently arrived at the Waffle House and Benefield then entered the truck and left the area after instructing the others to wait for his return. Crumbley related that Benefield returned to the Waffle House in a different vehicle in approximately one hour and then led Crumbley and the others to a house located on Lake Lanier, where Crumbley observed six or seven individuals off-loading white thirty-gallon drums from the Ryder truck. Crumbley described the packaging as very professional, with each drum tightly sealed so as to prevent any opening without use of a specifically designed wrench. Crumbley stated that the drums also were covered in a white powder that was intended to conceal the smell of marijuana. Crumbley stated that he purchased six hundred pounds of marijuana from Benefield on that occasion.

Crumbley stated that he was shot in the face and neck during a robbery at the Conley Road liquor store in 1984. Crumbley stated that he sold the Conley Road properties after that shooting; that he was depressed for a long time after the shooting and also began selling "crystal meth" during that time period. Crumbley further stated that he knew that he was the subject of narcotics investigations conducted by GBI, Clayton County and Fulton County. Crumbley later advised S/A Harvey that

"anyone can be bought. I ought to know." Crumbley also stated that he had a female connection at the phone company who could give him subscriber information on any telephone number he requested. At the conclusion of the second and final personal interview of Crumbley, which occurred on March 5, 1987, Crumbley stated that he would wait to hear from S/A Harvey regarding the list of demands presented by Crumbley to S/A's Bachman and Harvey.

On March 8, 1987 S/A Harvey beeped Crumbley at beeper number 404-360-9981 and received a returned phone call from Crumbley, recorded by S/A Harvey. During the conversation, Crumbley repeated his intention to cooperate in working a case against Benefield only if his demands were met. On March 17, 1987 S/A Harvey was beeped by Crumbley and returned a phone call to Crumbley. During that conversation, unrecorded, Crumbley stated that he was aware that he was under investigation by the Internal Revenue Service and he was very worried about that. Crumbley advised that his re-purchase of the Conley Road properties from Al Ballenger could cause him problems with the IRS and that he needed S/A Harvey to help get the IRS "off my back." Crumbley further advised that Benefield has recently been using an alias name, "Scott Herbert".

On March 19, 1987 S/A Harvey beeped Crumbley and received a return phone call from Crumbley. During that conversation, S/A Harvey advised Crumbley that he would not be accorded any benefits beyond those normally provided to any cooperating individual. Crumbley replied that he would not work under those

conditions, adding that "most of the people that work for you, you've already got in some other way. You ain't got me. I came in voluntarily through somebody else trying to help you all out on something." Crumbley concluded the conversation by stating that Benefield was back in town and had been in touch with Crumbley.

DEBRIEFING OF CI#1

On August 13, 1986 DEA Special Agents Ray Murray and Jack Harvey interviewed Confidential Source Number One (CI#1) regarding a marijuana and cocaine distribution organization currently operating in the Atlanta, Georgia area. A subsequent interview with the same CI#1 was conducted by S/A Harvey and IRS S/A Jerry Culver on August 27, 1976. CI#1 related the following;

Albert Ballenger owns a string of combination gas stations and convenience stores in the Atlanta area. Donald Gillette was hired by Ballenger in October of 1985 to work as a manager of Ballenger's business operations. Among the business owned by Ballenger at that time were: Continental Petroleum at 1420 Custer Avenue, A & B Discount at 1278 Custer Avenue, the Cheshire Bridge Spur Station at 2353 Cheshire Bridge Road, the Stewart Avenue Spur at 1241 Stewart Avenue and the Crossroads Spur at 2095 Stewart Avenue, all in Atlanta, Georgia. Ballenger had also owned a Spur gas station, liquor store and convenience store, all located at 807 Conley Road in Forest Park, Georgia, which he purchased from Troy Crumbley in 1984 and sold back to Crumbley in November of 1985. Ballenger also owned a car wash and laundromat

at that location, which have since been sold to an unidentified individual.

On the date of the closing, November 11, 1985, Gillette represented Ballenger in a meeting with Crumbley at 807 Conley Road. The sale contract called for Crumbley to pay Ballenger a \$10,000.00 down payment (bank check), to assume the payments on two notes held by creditors of the business and to give Ballenger an IOU note in that amount of \$75,000.00. Crumbley also paid to Ballenger \$135,000.00 in cash "under the table" for the liquor and convenience store inventory, which was assessed at a value of \$135,000.00 by a representative of a nationwide firm by the name of RGIS. The inventory was by RGIS on the date of closing. The \$135,000.00 consisted of mostly \$10 and \$20 bills which Crumbley removed from a plastic garbage bag. Crumbley and Gillette counted the money together by hand at a table in the manager's office located at the rear of the convenience store at 807 Conley Road. The counting of the money took approximately five hours, from 9 A.M. to 2 P.M. During the counting, Crumbley had two handguns, one revolver and one automatic, on the table beside the cash. The cash smelled "musty" and was said by Crumbley to have been buried for the past year. Most of the money was counted. The \$135,000.00 was deposited by Ballenger on the following day, November 12, 1985 into Ballenger's safety deposit box at the First National Bank of Atlanta, Jonesboro Branch.

In early December, Ballenger found himself in need of cash on short notice for an investment in a Florida real estate venture, so he contacted Crumbley and offered to allow Crumbley

to pay off half or all of the \$75,000.00 loan immediately at low interest. Crumbley agreed to pay half of the loan at that time, \$37,500.00. Crumbley and Gillette then met and again Crumbley produced cash in a plastic bag in mostly \$10 and \$20 bills which Crumbley said had been buried. Again Crumbley and Gillette counted the cash together in the back room at 807 Conley Road. Again Crumbley had his guns on display as the money was being counted. The \$37,500.00 was deposited by Gillette on the same day into the account of A & B Discount, account #08256950, at the C & S Bank, Stewart-Lakewood branch. Gillette and bank branch manager William LeCount counted the \$37,500.00 together at the time of that deposit.

At the December 1985 meeting at which Crumbley paid the \$37,500.00 Crumbley also gave Gillette a plastic Kroger grocery bag containing approximately two to three pounds of marijuana. In conversation between Crumbley and Gillette on that occasion, Crumbley told Gillette the various intricacies of marijuana growing areas and seasons in which marijuana is harvested. Crumbley told Gillette that a recent marijuana supply problem had caused him (Crumbley) to branch out more into the cocaine business. Kathy Parker, then the girlfriend of Crumbley who worked for Crumbley at the Conley Road liquor store, subsequently told Donald Gillette that Crumbley received shipments of marijuana from Mexico.

In three gas stations, Continental Petroleum on Lee Street and the two Spur Stations on Custer Avenue, Ballenger was a partner of Robert Williams and J.C. Hanks. Ballenger owned 49%

Williams 25% and Hanks 26%. Ballenger and Williams subsequently bought out Hanks' share of the business and Ballenger later bought Williams' remaining share, leaving Ballenger as the sole owner.

CI#1 also said that Crumbley was shot in a robbery at the Conley Road convenience store in 1984 before selling to it Ballenger. Crumbley owns two other businesses in addition to the Conley Road properties: Panama Package, a liquor store located at 4841 Jonesboro Road in Forest Park, and Desperado's nightclub at 5025 Jonesboro Road in Forest Park. Crumbley claims to have connections with prominent political and law enforcement figures in Clayton County. Crumbley has also boasted to Gillette that he has friends in the phone company who are in a position to warn Crumbley of any wiretaps being used by law enforcement against him.

DEBRIEFING OF CI#2

On Wednesday, May 28, 1987, your Affiant "debriefed" Confidential Informant Number Two (CI#2). CI#2 stated that he was contacted by Kenneth Victor Davis known as "K.V.". "K.V." informed CI#2 that located at the residence of Troy Crumbley was a quantity of drugs and money. Specifically, "K.V." said that two kilograms of cocaine and approximately \$200,000 in cash was at the residence. The cocaine was believed to be buried in the area of a dog pen. The cash was believed to be contained in a metal box which was to be found in a "crawl space" underneath the house. CI#2 stated to your Affiant that Troy Crumbley was the same person named in the newspaper article. [See newspaper

attachment.] CI#2 also stated that "K.V." informed him (CI#2) that Crumbley was in the drug business. "K.V." told CI#2 that he ("K.V.") knew of these facts from Crumbley's "partner." Lastly, "K.V." indicated that he ("K.V.") wanted to "rip off" Crumbley, but was concerned about law enforcement surveillance of the residence because of Crumbley's arrest for murder.

At approximately 12:00 p.m. (noon) on Thursday, May 28, 1987, your Affiant telephonically talked with CI#2. CI#2 stated that he had been contacted by "K.V." CI#2 met "K.V." and together they drove to Fayette County, Georgia. Specifically, they traveled to the address of "147 La Fayette, Fayette County." At that residence CI#2 was shown by "K.V." the "crawl space". CI#2 saw a women and a young child leaving the residence in a "station wagon." During the time spent with "K.V.", CI#2 was told by "K.V." that his ("K.V.") information concerning Crumbley's drugs and money came from Crumbley's "partner" in the drug business. CI#2 stated to your Affiant that "K.V." identified Crumbley's partner as "Frank". "K.V." further related to CI#2 that "Frank", together with "Larry Van Zant" had been arrested "four or five" months ago for "kilo" quantity of drugs. CI#2 told your Affiant that Van Zant was still in jail, but "Frank" was not in jail. Lastly, "K.V." told CI#2 that "Frank" was interested in "ripping off" Crumbley.

CORROBORATION OF CI#2

In addition to relying on the admissions against interest made to S/A Harvey by Troy Crumbley on February 17, and March 5,

1987 your Affiant believes CI#2 to be a credible and reliable witness based on the following facts.

On February 3, 1987 your Affiant personally participated in the arrest of one "Frank Craft" at the residence of Troy Crumbley located at 147 La Fayette Drive, Fayette County, Riverdale, Georgia. After his arrest Frank Craft advised DEA S/A Mike Huerta that a) there was \$40,000 of drug proceeds inside the residence and b) that a "Larry Van Zant" was at room 145 of the La Quinta Inn Motel on Old National Highway in possession of two kilograms of cocaine. A consent to search was given by both Frank Craft and his spouse, Mary Craft, which resulted in the seizure of residue amounts of cocaine and marijuana, \$33,760 in U.S. currency and records containing notations of purported drug transactions.

Your Affiant was present with other DEA agents when Larry Van Zant was arrested at room 145 of the La Quinta Motel. Mr. Van Zant was found in possession of approximately two kilograms of cocaine, drug paraphernalia (including a Triple beam scale and a plastic bag heat sealer), approximately \$854 in U.S. currency, and a 38 caliber Smith and Wesson revolver. At Crumbley's house Frank Craft informed DEA S/A Marsh in response to an inquiry as to who owned the residence at 147 La Fayette Drive that the house was owned by Troy Crumbley. Craft further stated that Crumbley "use to be" a "big time" marijuana smuggler, but he (Craft) did not think Crumbley was "in it" as much as he (Crumbley) use to be involved. Craft did acknowledge that he and Crumbley at one time discussed a one to two kilogram cocaine deal, but that Crumbley

"backed out" of the deal after he (Crumbly) saw Craft talking to an undercover police officer. Lastly, Craft stated that he (Craft) at one time had buried cash in the backyard of Crumbly's house.

STATEMENTS BY IRS S/A JERRY CULVER

Your Affiant has been informed by S/A Jerry Culver of the Internal Revenue Service of the following facts:

In 1983 Crumbly and his wife Deborah J. (now his ex-wife) reported to IRS gross income of \$51,032 which consisted of \$15,558.87 from Southeastern Freight Lines (\$1,564.00 was sick pay) for Troy Paul Crumbly, \$16,038.43 from the Federal Aviation Administration for Deborah J. Crumbly, \$182 State Refunds and \$19,253 from "Troy's Package Store" earned by Troy P. Crumbly. AGI for 1983 was \$49,428 with taxable income of \$40,276.00.

In 1984 Troy Crumbly was divorced and reported gross income of \$14,391. This consisted of \$1,819 interest income; \$2.00 in dividends, \$16,554 from a laundry mat and liquor store and \$4,929 loss from the sale of two businesses. AGI was \$14,391 and taxable income was \$5,802.

In 1985 Crumbly filed as being single and reported gross income of \$14,593.00. He reported \$1,667.00 interest income, \$72.00 in dividends and \$2,854 from a pension. AGI was \$4,593. Taxable income was \$2,513.00.

On May 7, 1987 S/A Culver interviewed Troy Paul Crumbly at the Fulton County Jail. Crumbly was advised of his In-Custody Rights. Crumbly stated that he understood his rights and would answer questions. During the questioning he stated he currently

resided at 147 La Fayette Drive, Fayette County, Riverdale, Georgia and has resided there since 1983. Crumbley is currently under arrest for murder. On May 21, 1987 a bond hearing was held in Fulton County Superior Court. Crumbley took the stand and made the following sworn statements:

1. He owns a MAC-10;
2. He has lived at 147 La Fayette Drive, Riverdale, Georgia since 1983;
3. He owns property valued at over \$1,000,000;
4. He has dealt in marijuana and has earned profits from the sale of it;
5. He is associated with at least 2 cocaine dealers.

Crumbley has not filed a 1986 tax return, however, he has W2's totaling approximately \$100,000 from his corporations for that year.

LOCATION OF PROPERTY

The property of Troy P. Crumbley is located at the following address:

147 La Fayette Drive, Fayette County,
Riverdale, Georgia; a single family
residential cedar and stone dwelling with a
dark stain on the cedar.

PROBABLE CAUSE

Based on the above factual assertions, I believe Troy P. Crumbley is a drug trafficker having dealt in substantial quantities of marijuana and cocaine. I further believe that he has for a number of years and is currently involved in the attempted sale of quantities of cocaine and/or marijuana. I also believe based on my experience that the above named individual

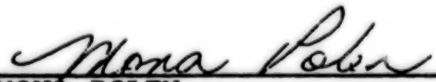
maintains numerous books and records of his financial transactions, items of wealth and other items of evidence (supra, pp. 2-5) at the following location:

A single family residential cedar and stone dwelling with a dark stain on the cedar located at 147 La Fayette Drive, Fayette County, Riverdale, Georgia.

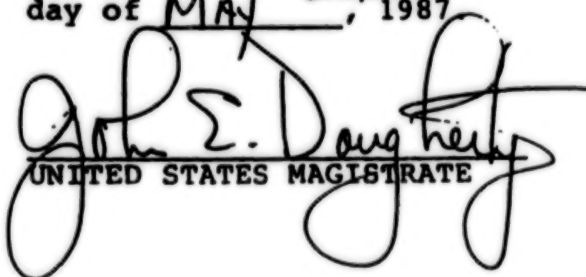
I believe that such financial records, currency, evidence of wealth and all items as detailed in Schedule A, attached hereto and incorporated herein, are contained on the residential premise of the above address. I respectfully request that a warrant be issued to search the property and premises of the above and seize the property identified in Schedule A.

DIRECTION AND DESCRIPTION OF RESIDENCE
FOR SEARCH WARRANT

From the intersection I-285 and Old National Highway, south approximately 6.2 miles to the intersection of La Fayette Drive and Old National Highway; left approximately .4 of one mile to 147 La Fayette Drive, Riverdale, Georgia. The residence is a single family dwelling cedar and stone building with a dark stain on the cedar. A metal black mailbox is in the front yard.


MONA POLEN
SPECIAL AGENT, U. S. DRUG
ENFORCEMENT ADMINISTRATION

Sworn to and subscribed
before me this 29th
day of MAY, 1987


UNITED STATES MAGISTRATE

SCHEDULE A

Property to be Seized

1. Books, records, receipts, notes, ledgers and other documents relating to transporting, ordering, purchasing and distributing controlled substances, in particular, cocaine, and marijuana Schedules II and I Controlled Dangerous Substance, respectively;
2. Papers, tickets, notes, schedules, receipts, and other items relating to domestic travel and foreign travel;
3. Books records, receipts, bank statements, money drafts, letters of credit, money orders, cashier's checks, receipts, passbooks, bank checks, and other items evidencing the obtainment, secretment, and/or concealment of assets and the obtainment, secretment, concealment and/or expenditure of money;
4. Proceeds of dealing in cocaine and marijuana and financial records relating thereto;
5. Cocaine, marijuana drug paraphernalia and all other contraband, including all firearms and ammunition;
6. All cash, currency, stocks, bonds (both foreign and domestic) and other items of wealth including, but not limited to jewelry and works of art.

All records to be seized are records from 1983 to the present.

All of the above being fruits, instrumentalities and evidence of violations of 21 U.S.C., Section 841 (a)(1), 846, 848, 952 and 963.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

THE UNITED STATES OF AMERICA :

v. :

TROY PAUL CRUMBLEY :

CRIMINAL INDICTMENT
CR 87-332A
CR.NO. 87- -A

MOTION FOR SEIZURE WARRANTS

The United States, by and through its attorneys, moves this Court pursuant to Title 21, United States Code, Section 853(f) for Seizure Warrant(s) against those properties identified in Attachment A to the affidavit of Special Agent John Harvey submitted in this action.

The government asserts that properties identified in Attachment A constitute assets which the defendant, Troy Paul Crumbley, who is charged with violating Title 21, United States Code, Section 848, maintained contractual rights thereto, interests in, claims against, and afforded a source of control over his enterprises. Further, the properties constitute proceeds traceable to narcotics violations, and/or were used to facilitate the narcotics violations of Troy Paul Crumbley. Accordingly, said assets are forfeitable to the United States pursuant to Title 21, United States Code, Section 853(a)(1)(2) and (3).

Based on the provision of Title 21 U.S.C. §853(d) a rebuttable presumption is raised that the properties are forfeitable to the government based on the preponderance of evidence

reflected in S/A Harvey's affidavit that a) the properties were acquired by Troy Paul Crumbley after October, 1984 (the effective date of the law); b) that the defendant was during the period of time in question a narcotics trafficker; and c) that the defendant did not have sufficient income from other sources to support his ability to purchase the assets. Based on Mr. Crumbley's reported income to IRS (see pages 17-18 of Polen Affidavit), the defendant did not report sufficient legal income to pay for the properties. It is respectfully submitted the rebuttable presumption of forfeiture has been raised by the government's evidence.

Lastly, based on the information that the defendant is endeavoring to liquidate his assets, a temporary restraining order would be insufficient to protect the interest of the government. Accordingly, it is requested that this Court issue seizure warrant(s) for the properties identified in Attachment A of S/A Harvey's Affidavit.

Respectfully submitted,

ROBERT L. BARR, JR.
UNITED STATES ATTORNEY



WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE
GA BAR NUMBER 563550

75 Spring St., S.W.
Room 1176
Atlanta, Georgia 30303
(404) 331-3784

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JUL 8 1987

LUTHER D. THOMAS, Clerk
By: *[Signature]*
Deputy Clerk

THE UNITED STATES OF AMERICA :
: CRIMINAL ACTION
V. :
: CR.NO. 87- 250 -A
TROY PAUL CRUMBLEY :

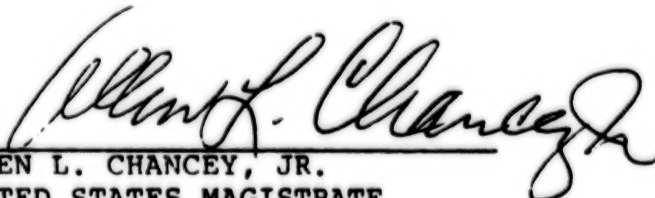
SEIZURE WARRANT
21 U.S.C. §853(f)

TO: ANY SPECIAL AGENT OF THE DRUG ENFORCEMENT
ADMINISTRATION OR OTHER FEDERAL OFFICER

Affidavit having been made before me by John Harvey, Special Agent, Drug Enforcement Administration, United States Department of Justice, that he has probable cause to believe that the following described properties as identified in Attachment A constitute proceeds traceable to exchanges of controlled substances or were used or intended to be used to facilitate a sale or exchange of controlled substances in violation of Title 21, United States Code, and that said properties are within the Northern District of Georgia; and as I am satisfied that there is probable cause to believe that the described properties as identified in Attachment A constitute proceeds traceable to exchanges of controlled substances or were used or intended to be used to facilitate the sale or exchange of controlled substances in violation of Title 21, United States Code, and that grounds for the issuance of the Seizure Warrant exist as stated in the supporting affidavit; and as I find that a temporary restraining order would be insufficient to protect the interests of the United States;

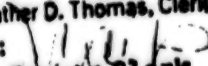
YOU ARE HEREBY COMMANDED to seize within a period of ten (10) days the following described properties as identified in Attachment A; serving certified copies of this Seizure Warrant with persons or entities having a known interest in the properties; taking control of the described properties, as identified in Attachment A; leaving a copy of this warrant with persons found at the described properties (if realty); preparing a written inventory thereof, and bring the written inventory and return of property before this Court as required by law, within ten (10) days after seizure. The properties to be seized pursuant to this warrant are described in Attachment A.

Dated this 8th day of July, 1987.


ALLEN L. CHANCEY, JR.
UNITED STATES MAGISTRATE
NORTHERN DISTRICT OF GEORGIA

ATTEST: A TRUE COPY
CERTIFIED THIS

JUL 8 1987

Luther D. Thomas, Clerk
By: 
Deputy Clerk

ATTACHMENT A

1. All that tract or parcel of land lying and being in Land Lot 197 of the 2nd District of Henry County, Georgia, being 9.27 acres per plat of Joe Rowan, Jr., Henry County Surveyor, dated August 27, 1985.
2. All that tract or parcel of land lying and being in Land Lots 188, 189 and 197 of the 2nd District, Henry County, Georgia and being more particularly described as 33.41 acres as shown on a plat drawn by Joe Rowan, Jr., for Wiley Brown and dated July 13, 1985. Frontage is shown as being 963.54 feet on Peeksville Road.
3. All that tract or parcel of land lying and being in Land Lot 212 of the 12th District of Clayton County, Georgia, being 0.95 acres as shown on a plat of survey by Lewis Hurd Surveyors for Albert Wilkerson dated November 5, 1985.
4. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 219 of the 13th District of Fayette County, Georgia, and being Lot 24, Block A of Unit Three of La Fayette Estates Subdivision, as per plat recorded in Plat Book 7, Page 195, Fayette County Records; said property being located at 147 La Fayette Drive, Riverdale, Georgia.
5. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 5 of the 6th District of Clayton County, Georgia, being Lot 30 Block A, Section I as shown on a plat of Lake Spivey Estates, said plat being recorded in Plat Book 7, page 83, Clayton County Records; said location of property being 2520 Emerald Drive, Jonesboro, Clayton County, Georgia.
6. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 32 of the 14th District of Fulton County, Georgia, containing 0.83 acres and designated "Parcel I" on that certain survey for Citizens and Southern National Bank by Delta Engineers and Surveyors, Inc., dated September 25, 1979; said location of property being 807 Conley Road, Atlanta, Fulton County, Georgia.
7. All that business, including cash, stocks and bonds, if any, and choses in action such as notes receivable, of "T.P.C., Inc.," represented by Troy Paul Crumbley to be a Georgia Corporation; said business shall include but not be limited to a) that downpayment of \$120,000.00 made by Woo Won Hwang and Young Soon Hwang for the purchase of that business known as the "Conley Road Spur Station" located at 807 Conley Road, Atlanta, Fulton County, Georgia; b) that promissory note executed on or about April 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$20,000 being due and payable to "T.P.C., Inc."; c) that promissory note executed on or about

July 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$160,000.00, payable in monthly installments of \$2,114.00 beginning May 20, 1987; d) that "Security Agreement" executed by Woo Won Hwang and Young Soon Hwang dated April 20, 1987 securing the two promissory notes identified previously; said notes and security agreement being created as part and parcel of the sale by Troy Paul Crumbley, "President" of a purported Georgia corporation, known as "T.P.C., Inc.," of the business known as the "Conley Road Spur Station."

8. That chose in action identified by that promissory note executed on June 13, 1986 by Fritz Albrecht for the principal sum of \$10,000.00 together with interest due and payable to Troy Paul Crumbley.
9. All that personal property, both tangible and intangible, specifically including inventory, currency, equipment, accounts receivable, etc. of that business known as Panama Package Liquor Store owned and operated by Party Package, Inc., and located at 4841 Jonesboro Road, Forest Park, Fulton County, Georgia.
10. All that business enterprise owned and operated by T. P. Crumbley and Associates, Inc., doing business as Desporado's and located at 5025 Jonesboro Road, Forest Park, Georgia, said business shall include but not be limited to said stock of the corporation, as well as its assets including leaseholds, fixtures, licenses, accounts receivable, bank accounts, etc.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MAR 29 1988

LUTHER D. THOMAS, Clerk
By: *CS* Deputy Clerk

THE UNITED STATES OF AMERICA,

v.

CRIMINAL INDICTMENT

CR88-132A

ROLLAND CALLAHAN, JR.,
a/k/a Cal Callahan
a/k/a Robert Johnson
a/k/a Carey Mims
a/k/a Richard Howard
a/k/a Cal
a/k/a Doc
ROY WILLIE CALLAHAN,
a/k/a Lorenzo Callahan
a/k/a Yogi
JAMIE LEE WILLIS,
a/k/a Jamie Callahan
a/k/a Zindi Mims
ZINDI RENEE MIMS,
ANTONIO LAVERE THOMAS,
a/k/a Tony
RICHARD SOLOMON ROSE, JR.
RONALD JAMES BIVINS,
DONALD LEE WILLIAMS,
DANIEL WADE,
LUTHER PASCHALL,
a/k/a Nickel,
CHARLES EUGENE CALLAWAY,
a/k/a Chuck
JERRY MICHAEL RHOME,
LINDA ELIZABETH SWIFT,
a/k/a Linda Pearson
HERSCHEL WILLIS KNOX,
CECIL CALLAHAN,
HENRY FORD CALLAHAN, JR.
CARLTON LEE DAVIS

MOTION FOR IMMEDIATE ACCOUNTING
AND PRODUCTION OF PARTNERSHIP RECORDS

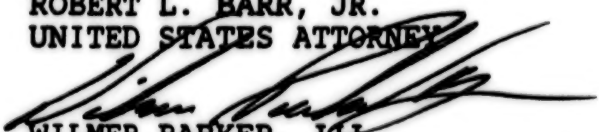
Comes now the United States of America, by and through the undersigned, and moves the Court for an order requiring the partnership known as the Law Firm of "Thomas & Dotson" to provide

an accounting of partnership assets and liabilities and the production of documents, forthwith.

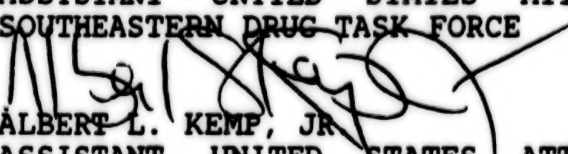
A memorandum in support of this motion is attached.

Respectfully submitted,

ROBERT L. BARR, JR.
UNITED STATES ATTORNEY



WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE



ALBERT L. KEMP, JR.
ASSISTANT UNITED STATES ATTORNEY

1800 U.S. Courthouse
75 Spring Street, S.W.
Atlanta, Georgia 30335
404/331-3707
Georgia Bar No. 413290

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

THE UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	CRIMINAL INDICTMENT
ROLLAND CALLAHAN, JR.,	:	
a/k/a Cal Callahan	:	CR88-132A
a/k/a Robert Johnson	:	
a/k/a Carey Mims	:	
a/k/a Richard Howard	:	
a/k/a Cal	:	
a/k/a Doc	:	
ROY WILLIE CALLAHAN,	:	
a/k/a Lorenzo Callahan	:	
a/k/a Yogi	:	
JAMIE LEE WILLIS,	:	
a/k/a Jamie Callahan	:	
a/k/a Zindi Mims	:	
ZINDI RENEE MIMS,	:	
ANTONIO LAVERE THOMAS,	:	
a/k/a Tony	:	
RICHARD SOLOMON ROSE, JR.	:	
RONALD JAMES BIVINS,	:	
DONALD LEE WILLIAMS,	:	
DANIEL WADE,	:	
LUTHER PASCHALL,	:	
a/k/a Nickel,	:	
CHARLES EUGENE CALLAWAY,	:	
a/k/a Chuck	:	
JERRY MICHAEL RHOME,	:	
LINDA ELIZABETH SWIFT,	:	
a/k/a Linda Pearson	:	
HERSCHEL WILLIS KNOX,	:	
CECIL CALLAHAN,	:	
HENRY FORD CALLAHAN, JR.	:	
CARLTON LEE DAVIS	:	

MEMORANDUM IN SUPPORT OF MOTION FOR
IMMEDIATE ACCOUNTING AND PRODUCTION
OF PARTNERSHIP RECORDS

On March 16, 1988, Antonio Laverre Thomas and others were indicted for, among other things, racketeering, conspiracy, and mail fraud, in violation of 18 U.S.C. §§ 1341, 1962(a), (c) and (d), and 2. Title 18 U.S.C. § 1962(c) states that it shall be

unlawful "for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate ... commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt." Section 1962(d) makes it unlawful to conspire to violate § 1961(c); and § 1963(a)(1) provides that a person convicted under § 1962 shall forfeit to the United States "any interest he has acquired or maintained in violation of Section 1962" (hereinafter sometimes referred to as "RICO forfeiture"). The interests of Antonio Laverne Thomas in the law firm of Thomas & Dotson is specifically set forth in the indictment as an interest maintained in violation of § 1962 and, consequently, is forfeited to the United States.

RICO forfeiture is in personam and is a punishment imposed on a guilty defendant. "It deprives that defendant of all of the assets that allow him to maintain an interest in a RICO enterprise, regardless of whether those assets are themselves 'tainted' by use in connection with the racketeering activity. United States v. Cauble, 706 F.2d 1322 (5th Cir. 1983), rehearing denied, 714 F.2d 137, cert. denied, 104 S.Ct. 996, 465 U.S. 1005, cert. denied 106 S.Ct. 406. In the instant matter, the escrow accounts maintained by Antonio Laverne Thomas in the Thomas & Dotson law firm are alleged to have been used to further the unlawful endeavors of the Callahan Enterprise. Also, Mr. Thomas is alleged to have provided his professional expertise and offices to assist the enterprise in concealing and laundering illegal monies received from its narcotic trafficking activities. Pursuant to 18 U.S.C.

Section 1963, the interest of Antonio Lavere Thomas is forfeitable to the United States.

In United States v. Conner, 752, F.2d 566 (11th Cir. 1985), cert denied, Taylor v. United States, 106 S. Ct. 72, 88 L.Ed.2d 59, The Eleventh Circuit stated:

Since the forfeiture is in personam, it follows the defendant as a part of the penalty and thus it does not require that the government trace it, even though the forfeiture is not due until conviction. Money is a fungible item. It matters not that the government received the identical money which defendants received as long as the amount that was received in violation of the racketeering statute is known. [Emphasis in original.]

Id. at 576.

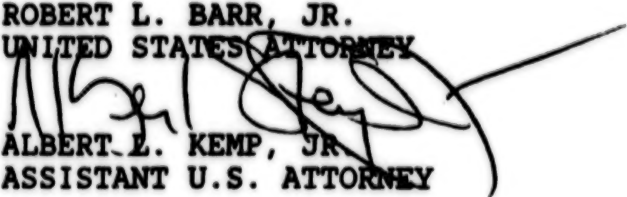
Title to forfeited property vests in the United States as of the date of commission of the offense. United States v. One 1967 ChrisCraft Boat, 423 F.2d 1293 (5th Cir. 1970). The owner of an interest in partnership property is entitled to an accounting and the production of all partnership records and documents. See, O.C.G.A. § 14-8-19, Partnership books; and O.C.G.A. § 14-8-12, Right to formal accounting of partnership affairs. An immediate accounting and the production of records is needed to identify and preserve the entirety of the forfeited partnership interest of Antonio Lavere Thomas. Moreover, no prejudice will be suffered by the production of an accounting and records inasmuch as all partners are by law entitled to such information.

Wherefore, the United States seeks an order directing the partnership known as the law firm of "Thomas & Dotson" its

partners, agents and accountants to provide the United States with an accounting of the partnership assets and liabilities and the production all partnership documents, forthwith.

Respectfully submitted

ROBERT L. BARR, JR.
UNITED STATES ATTORNEY



ALBERT L. KEMP, JR.
ASSISTANT U.S. ATTORNEY

1800 U.S. Courthouse
75 Spring Street, S.W.
Atlanta, Georgia 30335
404/331-3707
Georgia Bar No. 413290

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the persons listed below a copy of the foregoing document by depositing in the United States Mail a copy of same in a franked envelope requiring no postage for delivery:

Antonio Laverne Thomas
Donald M. Dotson
Thomas & Dotson
151 Ponce De Leon Ave., N.E.
Suite 201
Atlanta, Georgia 30308

Bensonetta Tipton Lane
3750 Will Lee Road
College Park, Georgia 30349

George O. Lawson
970 Martin Luther King Drive, S.W.
Suite 202
Atlanta, Georgia 30314

This 29th day of March, 1988.


ALBERT L. KEMP, JR.
ASSISTANT UNITED STATES ATTORNEY

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta
MAR 18 1988

LUTHER D. THOMAS, Clerk
By: *M. Hunter*
Deputy Clerk

UNITED STATES OF AMERICA :

V. :

CR NO. 88-132-A

ROLLAND CALLAHAN, JR., et. al. :

GOVERNMENT'S APPLICATION FOR A
RESTRAINING ORDER PRESERVING
PROPERTY SUBJECT TO FORFEITURE

The United States of America, by and through its authorized counsel, pursuant to the provisions of Title 18, United States Code, Section 1963(d)(1)(A) and Title 21, United States Code, Section 853(e)(1)(A), hereby makes an application to this Court seeking the entry of a restraining order of injunction which will preserve the availability of the property identified in Exhibit A (attached hereto and incorporated herein) which is alleged by the grand jury to be forfeitable to the United States. In support of this application, the government asserts the following:

1. On March 16, 1988, Grand Jury 86-3 (Rogers) returned a multi-defendant, multi-count indictment charging inter alia criminal violations of the racketeering laws (Title 18, United States Code, Sections 1962(a), (c), and (d)), and narcotic laws (Title 21, United States Code, Sections 841(a)(1), 846 and 848). Further, the grand jury alleges that there is probable cause for the property identified in Exhibit A to be forfeited to

the government pursuant to the provisions of Title 18, United States Code, Section 1963(b) and (c) and Title 21, United States Code, Section 853(a).

2. In order to insure the availability of the identified property, some of which is very liquid (monies in bank accounts, stocks, bonds, etc.), the government requests that this Court enter a restraining order/injunction prohibiting any named defendant in indictment CR88-132-A, and any third parties (including financial institutions) which maintain custody and control over the property from transferring, disposing, diminishing, and dissipating any of the property, including all real property, personal property and choses in action with financial institutions until further order by this Court following the disposition of the criminal forfeiture litigation.

WHEREFORE, based on the above and foregoing, the United States respectfully requests the Court to grant its application.

Respectfully submitted,

ROBERT L. BARR, JR.
UNITED STATES ATTORNEY



WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE
Georgia Bar No. 563550

EXHIBIT A

FORFEITURE PROVISIONS

1. This Indictment charges defendants,

ROLLAND CALLAHAN, JR.,
a/k/a Cal Callahan
a/k/a Robert Johnson
a/k/a Carey Mims
a/k/a Richard Howard
a/k/a Cal
a/k/a Doc
ROY WILLIE CALLAHAN,
a/k/a Lorenzo Callahan
a/k/a Yogi
JAMIE LEE WILLIS,
a/k/a Jamie Callahan
a/k/a Zindi Mims
ZINDI RENEE MIMS,
ANTONIO LAVERE THOMAS,
a/k/a Tony
RICHARD SOLOMON ROSE, JR.,
RONALD JAMES RIVINS,
DONALD LEE WILLIAMS,
DANIEL WADE,
LUTHER PASCHALL,
a/k/a Nickel
CHARLES EUGENE CALLAWAY,
a/k/a Chuck
JERRY MICHAEL RHOME,
LINDA ELIZABETH SWIFT,
a/k/a Linda Pearson
HERSCHEL WILLIS KNOX,
CECIL CALLAHAN,
HENRY FORD CALLAHAN, JR.,
CARLTON LEE DAVIS

and others with certain violations of Title 21, United States Code, Sections 841(a)(1), 846 and 848, and upon conviction of any violation of these laws, such convicted defendants shall forfeit to the United States (1) any property constituting or derived from any proceeds the person obtained, directly or indirectly, as the result of such violation, and (2) any of the person's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation; pursuant to Title 21, United States Code, Section 853.

2. Count IV of this Indictment charges the defendant,

ROLLAND CALLAHAN, JR.

with engaging in a continuing criminal enterprise in violation of Title 21, United States Code, Section 848, and upon conviction, shall forfeit to the United States, in addition to any property described in paragraph 1 above, any of his interest in, claims against and property or contractual rights affording a source of control over the continuing criminal enterprise; pursuant to Title 21, United States Code, Section 853.

3. Counts I, II, and III of this Indictment, also charge the defendants,

ROLLAND CALLAHAN, JR.,
ROY WILLIE CALLAHAN,
JAMIE LEE WILLIS,
ZINDI RENEE MIMS,
ANTONIO LAVERE THOMAS,
RICHARD SOLOMON ROSE, JR.,
RONALD JAMES BIVINS,
DONALD LEE WILLIAMS,
DANIEL WADE,
LUTHER PASCHALL,
CHARLES EUGENE CALLAWAY,
JERRY MICHAEL RHOME,

with various violations of Title 18, United States Code, Sections 1962(a), (c) and (d) and on conviction thereof criminal forfeiture of property shall be imposed as a sentence. Such forfeiture shall include any interest a defendant has acquired or maintained in violation of Section 1962; any interest in, security of, claim against, and property and contractual right of any kind affording a source of influence over the Callahan Enterprise

which the defendant established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from racketeering activity in violation of Section 1962. Accordingly, the following listed properties, are also subject to forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Section 1963.

4. Such forfeitures under Title 18, United States Code, Section 1963 and Title 21, United States Code, Section 853, shall include but are not limited to the following:

	<u>REAL ESTATE</u>	<u>DESCRIPTION</u>
a.	Land Lot 68, District 15 Lots 31, 32, 33, Block C, Pinehurst Subdivision, 3979 Pinehurst Place Decatur, Georgia	Residential Dwelling
b.	3504 Stanford Circle Decatur, Georgia	Residential Dwelling
c.	2166 Rollingview Drive Decatur, Georgia	Residential Dwelling
d.	2174 Rollingview Drive Decatur, Georgia	Residential Dwelling
e.	4225 Janice Drive College Park, Georgia	Residential Dwelling
f.	4042 Pinehurst Valley Dr. Decatur, Georgia	Residential Dwelling
g.	3496 Wesley Chapel Road	Residential Dwelling

	Decatur, Georgia	
h.	2425 Columbia Drive Decatur, Georgia	Vacant Land
i.	Lot One Block 122 of Belle Terre Section 35-Q, Palm Coast Flagler County, Florida	Vacant Land
j.	1509 Third Avenue Phenix City, Alabama	Commercial Buildings
k.	741 Winston Road Columbus, Georgia	9-Unit Apartment Complex
l.	50 Acres (45.8) at District 15 LL61,62,67,68 Wesley Chapel and Flat Shoals Road Decatur, Georgia	Vacant Land
m.	1072 Cascade Road Atlanta, Georgia	Commercial Building
n.	Sugartown Lot Russell Co., Alabama	Vacant Land
o.	4.715 Acres & 4.825 Acres Sections 23 & 24, Township 19N, Range 28 East Lee County, Alabama	Vacant Land
p.	1915 Perry Boulevard, N.W. Atlanta, Georgia	Commercial Shopping Center
q.	934 Stewart Avenue, S.W. Atlanta, Georgia	Commercial Garage
r.	15.084 Acres Land Lot 227 Pike County, Georgia	Rural Property
s.	2.97 Acres Seale Road Phenix City, Alabama	Vacant Land
t.	1585 Stanford Way Decatur, Georgia	Residential Dwelling

u.	3420 Hyland Drive Decatur, Georgia	Residential Dwelling
v.	3735 Greentree Drive Decatur, Georgia	Residential Dwelling
w.	8591 Forest Pointe Drive Jonesboro, Georgia	Residential Dwelling
x.	3168 Nectarine Circle Decatur, Georgia	Residential Dwelling
y.	747 Cascade Avenue Atlanta, Georgia	Commercial Building
z.	2075 Highpoint Trail Fulton Co., Georgia	Residential Dwelling
aa.	3285 Columbia Woods Drive Decatur, Georgia	Commercial Building
bb.	1979 South Columbia Place Decatur, Georgia	Residential Dwelling
cc.	3177 Quince Tree Lane Decatur, Georgia	Residential Dwelling
dd.	1.5 Acres, Phenix City Alabama, (SE 1/4 of Sect. 27, Township 17N, Range E) Russell Co., Alabama	
ee.	270 Dix Leeon Drive Fayette County, Georgia	Residential Dwelling
ff.	2048 Flat Shoals Rd., S.E. Atlanta, Georgia 30316	Residential Dwelling

CORPORATIONS

gg.	Gorcal, Inc. Atlanta, Georgia
hh.	Nu Business Ventures, Inc. Atlanta, Georgia
ii.	Loleca, Inc. Atlanta, Georgia

- ij. Rowica, Inc.
Atlanta, Georgia
- kk. Cawica, Inc.
Atlanta, Georgia
- ll. Allegheny-St. Croix, Inc.
Minneapolis, Minnesota
- mm. Kiwi, Inc.
Atlanta, Georgia
- nn. Jallan, Inc.
Atlanta, Georgia
- oo. Callena, Inc.
Atlanta, Georgia
- pp. Music Developers, Inc.
Atlanta, Georgia
- qq. Entertainment Developers, Inc.
Atlanta, Georgia
- rr. Business Systems Applications, Inc.
747 Cascade Avenue
Atlanta, Georgia

UNINCORPORATED BUSINESSES

- ss. RHM Financial Service
1072 Cascade Road
Atlanta, Georgia
- tt. Yogi's I
1915 Perry Boulevard
Atlanta, Georgia
- uu. Yogi's II
1072 Cascade Road
Atlanta, Georgia
- vv. Richard Rose & Associates
747 Cascade Avenue
Atlanta, Georgia

<u>VEHICLES</u>	<u>VIN #</u>
ww. 1981 Mercedes Benz, Stationwagon	BAB93A0BN003122
xx. 1982 Mercedes Benz SD	WDBC20A3CB022402
yy. 1982 DeLorean	SCEDT26T6CD011013
zz. 1983 Ford Pick-up	1FTLF10Y701A78738
aaa. 1985 Jeep CJ-7	1JLLM87AXFT005369
bbb. 1985 Toyota Van	TT4YR27V4F0028558
ccc. 1985 Toyota Corolla	JT2AE82E9G3277910
ddd. 1986 Pontiac Trans Am	1G2FW87H5GL256134
eee. 1986 GMC Jimmy	1G5CT18R3G8517342
fff. 1978 Mercedes Benz, 240D	12312312053962

<u>BANK ACCOUNTS</u>	<u>NUMBER</u>
ggg. ZINDI RENEE MIMS 1st American Bank Atlanta, Georgia	026011759
hhh. JAMIE LEE WILLIS CALLAHAN Bank of the South Atlanta, Georgia	0701157
iii. Loleca, Inc. 1st American Bank Atlanta, Georgia	5100058005
jjj. RHM Financial Services 1st American Bank Atlanta, Georgia	510003865-9
kkk. Callena, Inc. C & S Bank Atlanta, Georgia	023-41-717

lll.	Nu Business Ventures, Inc.	02202208
	C & S Bank	
	Atlanta, Georgia	
mmm.	Gorcal Inc.	0198099
	Bank of the South	
	Atlanta, Georgia	
nnn.	Allegheny-St.Croix, Inc.	107-4628
	National City Bank	
	Minneapolis, Minnesota	
ooo.	ANTONIO LAVERE THOMAS	11-154-389-00
	Georgia Federal Savings & Loan	
	Atlanta, Georgia	
ppp.	ANTONIO LAVERE THOMAS	8800292222
	Trust Company Bank	
	Atlanta, Georgia	
qqq.	Thomas & Dotson	025-22-159
	Attorney at Law	046-92-893
	C & S Bank	
	Atlanta, Georgia	
rrr.	Business Systems	5100072415
	Applications, Inc.	
	DBA Practical Solutions	
	1st American Bank	
	Atlanta, Georgia	

LAW FIRM INTEREST

Defendant ANTONIO LAVERE THOMAS' interest in the law firm of:

sss. Thomas & Dotson
 151 Ponce De Leon Avenue, N.E.
 Suite 201
 Atlanta, Georgia

INVESTMENTS

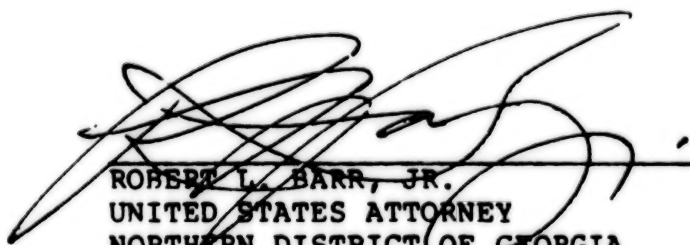
ACCOUNT

ttt.	Cecil Callahan and/or	46-90571-7
	Allegheny-St.Croix, Inc.	46-90563-4
	Drexel, Burnham Lambert	
	New York, New York	

uuu. Allegheny-St. Croix, Inc. 1087-7261
Charles Schwab & Co.
Minneapolis, Minnesota

A True BILL.

James W. Rogers
FOREPERSON


ROBERT L. BARR, JR.
UNITED STATES ATTORNEY
NORTHERN DISTRICT OF GEORGIA


WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
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LUTHER D. THOMAS, Clerk
By: *Mr. Hunter*
Deputy Clerk

UNITED STATES OF AMERICA :
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 V. : CR NO. 88-132-A
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 ROLLAND CALLAHAN, JR., et. al. :

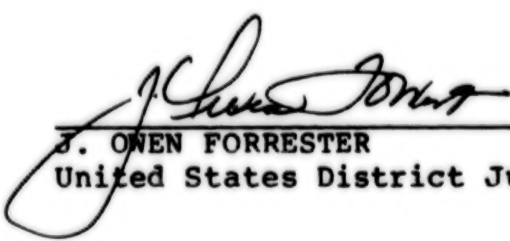
O R D E R

The Court having reviewed the ex parte motion by the government seeking an order, pursuant to the provisions of Rule 6(e)(3)(C)(i) of the Federal Rules of Criminal Procedure, for disclosure of grand jury material of Grand Jury 86-3 (Rogers) to be used in seeking search warrants; and the Court having been informed that the grand jury returned on March 16, 1988, a 99 page indictment charging inter alia violations of the racketeering and tax laws of the United States;

The Court hereby finds that the government's motion, having been made pursuant to Rule 6(e)(3)(D), seeks disclosure of grand jury material, "preliminarily to or in connection with a judicial proceeding," pending within the Northern District of Georgia; that the government has articulated a particularized need for the disclosure of such material (applications for search warrants to authorize the seizure of evidence of the crimes charged within the indictment); and the interests of justice in the disclosure of the grand jury material outweighs the general rule maintaining secrecy of proceedings before the grand jury.

It is therefore ORDERED that the government's motion is GRANTED. The government may disclose such grand jury material of Grand Jury 86-3 (Rogers) as it deems necessary in its search warrant applications to the United States Magistrate. The search warrant applications, together with this order, are to remain sealed until the execution of the warrants at which time such matters shall be unsealed. The government may disclose, prior to unsealing, this order and the search warrant applications to such law enforcement personnel as are necessary to effect the execution of the search warrants and other contemplated law enforcement activity regarding this case.

So ORDERED this 17th day of March, 1988.



J. OWEN FORRESTER
United States District Judge

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

MAR 18 1988

UNITED STATES OF AMERICA

V.

ROLLAND CALLAHAN, JR., et. al.

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CR NO. 88-132-A

LUTHER D. THOMAS, Clerk
By: *M. Henderson*
Deputy Clerk

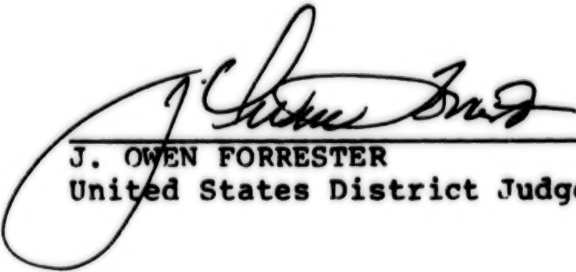
O R D E R

The Court having received and reviewed the application of the government seeking a restraining order/injunction prohibiting the named defendants in the above-styled action, together with all third parties (including financial institutions) who maintain control over the identified properties listed in Exhibit A (attached hereto and incorporated herein) from transferring, disposing, diminishing, and dissipating such property until the conclusion of the criminal forfeiture action; and the Court being satisfied that an indictment has been returned which alleges that the property is subject to being forfeited to the United States;

It is ORDERED and ADJUDGED that pursuant to Title 18, United States Code, Section 1963(d)(1)(A) and Title 21, United States Code, Section 853(e)(1)(A), this Court finds that the application by the government for a restraining order/injunction is appropriate; accordingly, the Court GRANTS the government's application and hereby DIRECTS and ORDERS that all named defendants in the above-styled action, and all third parties who

maintain custody, control or possession of all property identified in Exhibit A, attached hereto, are PROHIBITED and ENJOINED from transferring, disposing, diminishing or dissipating said property until further order of this Court. Further, the Court directs that the financial institutions identified in Exhibit A file with the Court a statement reflecting the amount of monies, stocks, bonds, mutual funds, etc., which each institution maintains. The government is DIRECTED to serve on each defendant and third party a copy of this order which is to be sealed until the execution of the defendants' arrest warrants.

So ORDERED this 17th day of March, 1988.



J. OWEN FORRESTER
United States District Judge

EXHIBIT A

FORFEITURE PROVISIONS

1. This Indictment charges defendants,

ROLLAND CALLAHAN, JR.,
a/k/a Cal Callahan
a/k/a Robert Johnson
a/k/a Carey Mims
a/k/a Richard Howard
a/k/a Cal
a/k/a Doc
ROY WILLIE CALLAHAN,
a/k/a Lorenzo Callahan
a/k/a Yogi
JAMIE LEE WILLIS,
a/k/a Jamie Callahan
a/k/a Zindi Mims
ZINDI RENEE MIMS,
ANTONIO LAVERE THOMAS,
a/k/a Tony
RICHARD SOLOMON ROSE, JR.,
RONALD JAMES RIVINS,
DONALD LEE WILLIAMS,
DANIEL WADE,
LUTHER PASCHALL,
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CHARLES EUGENE CALLAWAY,
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JERRY MICHAEL RHOME,
LINDA ELIZABETH SWIFT,
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HERSCHEL WILLIS KNOX,
CECIL CALLAHAN,
HENRY FORD CALLAHAN, JR.,
CARLTON LEE DAVIS

and others with certain violations of Title 21, United States Code, Sections 841(a)(1), 846 and 848, and upon conviction of any violation of these laws, such convicted defendants shall forfeit to the United States (1) any property constituting or derived from any proceeds the person obtained, directly or indirectly, as the result of such violation, and (2) any of the person's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation; pursuant to Title 21, United States Code, Section 853.

2. Count IV of this Indictment charges the defendant,

ROLLAND CALLAHAN, JR.

with engaging in a continuing criminal enterprise in violation of Title 21, United States Code, Section 848, and upon conviction, shall forfeit to the United States, in addition to any property described in paragraph 1 above, any of his interest in, claims against and property or contractual rights affording a source of control over the continuing criminal enterprise; pursuant to Title 21, United States Code, Section 853.

3. Counts I, II, and III of this Indictment, also charge the defendants,

ROLLAND CALLAHAN, JR.,
ROY WILLIE CALLAHAN,
JAMIE LEE WILLIS,
ZINDI RENEE MIMS,
ANTONIO LAVERE THOMAS,
RICHARD SOLOMON ROSE, JR.,
RONALD JAMES BIVINS,
DONALD LEE WILLIAMS,
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with various violations of Title 18, United States Code, Sections 1962(a), (c) and (d) and on conviction thereof criminal forfeiture of property shall be imposed as a sentence. Such forfeiture shall include any interest a defendant has acquired or maintained in violation of Section 1962; any interest in, security of, claim against, and property and contractual right of any kind affording a source of influence over the Callahan Enterprise

which the defendant established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from racketeering activity in violation of Section 1962. Accordingly, the following listed properties, are also subject to forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Section 1963.

4. Such forfeitures under Title 18, United States Code, Section 1963 and Title 21, United States Code, Section 853, shall include but are not limited to the following:

<u>REAL ESTATE</u>	<u>DESCRIPTION</u>
a. Land Lot 68, District 15 Lots 31, 32, 33, Block C, Pinehurst Subdivision, 3979 Pinehurst Place Decatur, Georgia	Residential Dwelling
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c. 2166 Rollingview Drive Decatur, Georgia	Residential Dwelling
d. 2174 Rollingview Drive Decatur, Georgia	Residential Dwelling
e. 4225 Janice Drive College Park, Georgia	Residential Dwelling
f. 4042 Pinehurst Valley Dr. Decatur, Georgia	Residential Dwelling
g. 3496 Wesley Chapel Road	Residential Dwelling

Decatur, Georgia

- | | | |
|----|--|----------------------------|
| h. | 2425 Columbia Drive
Decatur, Georgia | Vacant Land |
| i. | Lot One
Block 122 of Belle Terre
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| j. | 1509 Third Avenue
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| k. | 741 Winston Road
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Sections 23 & 24,
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Lee County, Alabama | Vacant Land |
| p. | 1915 Perry Boulevard, N.W.
Atlanta, Georgia | Commercial Shopping Center |
| q. | 934 Stewart Avenue, S.W.
Atlanta, Georgia | Commercial Garage |
| r. | 15.084 Acres
Land Lot 227
Pike County, Georgia | Rural Property |
| s. | 2.97 Acres
Seale Road
Phenix City, Alabama | Vacant Land |
| t. | 1585 Stanford Way
Decatur, Georgia | Residential Dwelling |

u.	3420 Hyland Drive Decatur, Georgia	Residential Dwelling
v.	3735 Greentree Drive Decatur, Georgia	Residential Dwelling
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bb.	1979 South Columbia Place Decatur, Georgia	Residential Dwelling
cc.	3177 Quince Tree Lane Decatur, Georgia	Residential Dwelling
dd.	1.5 Acres, Phenix City Alabama, (SE 1/4 of Sect. 27, Township 17N, Range E) Russell Co., Alabama	
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ff.	2048 Flat Shoals Rd., S.E. Atlanta, Georgia 30316	Residential Dwelling

CORPORATIONS

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ii.	Loleca, Inc. Atlanta, Georgia

- jj. Rowica, Inc.
Atlanta, Georgia
- kk. Cawica, Inc.
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- nn. Jallan, Inc.
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- oo. Callena, Inc.
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Atlanta, Georgia
- qq. Entertainment Developers, Inc.
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- rr. Business Systems Applications, Inc.
747 Cascade Avenue
Atlanta, Georgia

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- ss. RHM Financial Service
1072 Cascade Road
Atlanta, Georgia
- tt. Yogi's I
1915 Perry Boulevard
Atlanta, Georgia
- uu. Yogi's II
1072 Cascade Road
Atlanta, Georgia
- vv. Richard Rose & Associates
747 Cascade Avenue
Atlanta, Georgia

<u>VEHICLES</u>	<u>VTN #</u>
ww. 1981 Mercedes Benz, Stationwagon	BAB93A0BN003122
xx. 1982 Mercedes Benz SD	WDBCB20A3CB022402
yy. 1982 DeLorean	SCEDT26T6CD011013
zz. 1983 Ford Pick-up	1FTLF10Y701A78738
aaa. 1985 Jeep CJ-7	1JLLM87AXFT005369
bbb. 1985 Toyota Van	TT4YR27V4F0028558
ccc. 1985 Toyota Corolla	JT2AE82E9G3277910
ddd. 1986 Pontiac Trans Am	1G2FW87H5GL256134
eee. 1986 GMC Jimmy	1G5CT18R3G8517342
fff. 1978 Mercedes Benz, 240D	12312312053962

<u>BANK ACCOUNTS</u>	<u>NUMBER</u>
ggg. ZINDI RENEE MIMS 1st American Bank Atlanta, Georgia	026011759
hhh. JAMIE LEE WILLIS CALLAHAN Bank of the South Atlanta, Georgia	0701157
iii. Loleca, Inc. 1st American Bank Atlanta, Georgia	5100058005
jjj. RHM Financial Services 1st American Bank Atlanta, Georgia	510003865-9
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	Atlanta, Georgia	
mmm.	Gorcal Inc.	0198099
	Bank of the South	
	Atlanta, Georgia	
nnn.	Allegheny-St.Croix, Inc.	107-4628
	National City Bank	
	Minneapolis, Minnesota	
ooo.	ANTONIO LAVERE THOMAS	11-154-389-00
	Georgia Federal Savings & Loan	
	Atlanta, Georgia	
ppp.	ANTONIO LAVERE THOMAS	8800292222
	Trust Company Bank	
	Atlanta, Georgia	
qqq.	Thomas & Dotson	025-22-159
	Attorney at Law	046-92-893
	C & S Bank	
	Atlanta, Georgia	
rrr.	Business Systems	5100072415
	Applications, Inc.	
	DBA Practical Solutions	
	1st American Bank	
	Atlanta, Georgia	

LAW FIRM INTEREST

Defendant ANTONIO LAVERE THOMAS' interest in the law firm of:

sss. Thomas & Dotson
 151 Ponce De Leon Avenue, N.E.
 Suite 201
 Atlanta, Georgia

INVESTMENTS

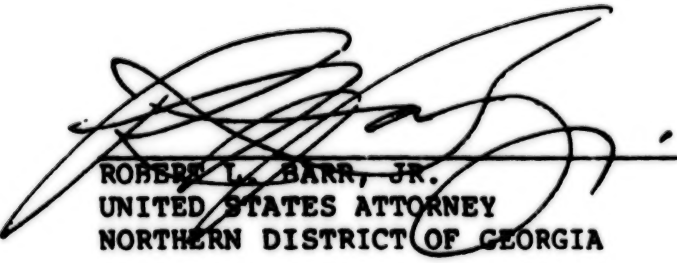
ACCOUNT

ttt.	Cecil Callahan and/or	46-90571-7
	Allegheny-St.Croix, Inc.	46-90563-4
	Drexel, Burnham Lambert	
	New York, New York	

uuu. Allegheny-St. Croix, Inc. 1087-7261
Charles Schwab & Co.
Minneapolis, Minnesota

A True BILL.

James W. Rhodes
FOREPERSON


ROBERT L. BARR, JR.
UNITED STATES ATTORNEY
NORTHERN DISTRICT OF GEORGIA


WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
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ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

MAR 18 1988

UNITED STATES OF AMERICA,

V.

ROLLAND CALLAHAN, JR., et. al.,

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LUTHER D. THOMAS, Clerk

By:

CR NO. 88-132-A

Deputy Clerk

MOTION TO DISCLOSE
GRAND JURY MATERIAL

The United States of America, by and through its undersigned counsel, hereby moves this Court, pursuant to the provisions of Rule 6(e)(3)(C)(i) of the Federal Rules of Criminal Procedure, for disclosure of grand jury material which is necessary to prepare affidavits for search warrants to be submitted to the United States Magistrate for the Northern District of Georgia. In support of its position, the government argues the following:

1. On March 16, 1988, Grand Jury 86-3 (Rogers), sitting in the Northern District of Georgia, returned a true bill of indictment charging Rolland Callahan, Jr. and sixteen other co-defendants with various violations of the racketeering, narcotic, tax, mail fraud, violence in aid of racketeering, money laundering, and obstruction of justice laws of the United States of America. The 99 page indictment is currently sealed pending execution of arrest warrants scheduled for Thursday, March 24, 1988.

2. The gist of the grand jury charges are that Rolland Callahan, Jr. organized, managed, and supervised, within the

Atlanta area, a racketeering enterprise which distributed cocaine and marijuana and which invested the proceeds of such distribution in various nominee corporations and other assets, both real and personal. The indictment alleges that some sixteen different corporations or businesses together with thirty-two parcels of real estate (or interest therein) are subject to forfeiture to the United States. The indictment further alleges that professionals (attorneys, accountants, and real estate agents) assisted the enterprise in secreting and concealing its narcotic proceeds through the use of purported legitimate businesses. The time frame for the alleged illegal activity is stated to be from on or about 1975 to the return of the indictment.

3. Rule 6(e)(3)(D) of the Federal Rules of Criminal Procedure provides that an ex parte application may be made by the government seeking disclosure of grand jury material, "...preliminarily to or in connection with a judicial proceeding." Rule 6(e)(3)(C)(i) provides the authority to the Court to grant this request by the government.

4. In addition to the arrest warrants to be executed on Tuesday, March 22, 1988, the government also anticipates executing, pursuant to Rule 41, Federal Rules of Criminal Procedure, search and seizure warrants for various locations where it is believed that probable cause exists to seize evidence of the various racketeering and tax violations charged in the previously described indictment. The government seeks the disclosure of the grand jury material so that the reviewing Magistrate may be

informed of the full nature and scope of the statements of government witnesses made under oath and subject to the penalties of perjury. Further, as certain witnesses were compelled to testify pursuant to Title 18, United States Code, Sections 6002 and 6003, their statements were only provided before the grand jury, as opposed to case agents prior to a grand jury appearance. Accordingly, the government represents that in order to present a complete "picture" (including various witnesses' contradictory statements) to the reviewing Magistrate, so that an impartial analysis may be made by the judicial officer, it is necessary that grand jury material be disclosed in the search warrant affidavit.

5. The search warrants are sought in connection with a judicial proceeding, to wit: the criminal prosecution of the Callahan Enterprise. The necessity for grand jury secrecy is substantially minimized in light of the return of the detailed indictment by the grand jury, and the justifiable need to use grand jury information to seek warrants authorizing the seizure of evidence of crimes charged within the indictment. In short, the interests of justice, as articulated herein, warrant the granting of the government's request.

WHEREFORE, based on the above and foregoing particularized need, it is requested that the Court grant the government's motion.

Respectfully submitted,

ROBERT L. BARR, JR.
United States Attorney
Northern District of Georgia



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NOV 3 1987

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

LUTHER D. THOMAS, CLERK
By: *B. L. Walker*
Deputy Clerk

ATLANTA DIVISION

THE UNITED STATES OF AMERICA, :
 :
Plaintiff, : CRIMINAL INDICTMENT
V. :
 :
TROY PAUL CRUMBLEY : CR.NO. 87-250-A
HERBERT STEVE BENEFIELD : (SUPERSEDING)
a/k/a Scott Herbert :
FRANK MARVIN CRAFT :
MICHAEL W. THOMAS :
STANLEY H. JONES :
JAMES HAROLD BLACKSTOCK :
CREIG WYLAN STALLINGS :
JAMES NATHAN STUCKEY :
a/k/a Jimmy :
J. MICHAEL BARBER :
a/k/a Mike Waits :
WILLIAM W. SPRINGER, JR. :
a/k/a Butch :
CATHERINE ANNE PARKER :
MICHELLE MARIE MCALHANEY :
SUSAN MCALHANEY :
LORI LYNN ESTRADA :
 :
Defendants. :

THE GRAND JURY CHARGES:

COUNT ONE

That from a date unknown to the Grand Jury but by January, 1984, and continuing to the return of this indictment, in the Northern District of Georgia, and elsewhere, the defendants,

TROY PAUL CRUMBLEY
HERBERT STEVE BENEFIELD
a/k/a Scott Herbert
FRANK MARVIN CRAFT

MICHAEL W. THOMAS
STANLEY H. JONES
JAMES HAROLD BLACKSTOCK
CREIG WYLAN STALLINGS
JAMES NATHAN STUCKEY
a/k/a Jimmy
J. MICHAEL BARBER
a/k/a Mike Waits
WILLIAM W. SPRINGER, JR.
a/k/a Butch
CATHERINE ANNE PARKER
MICHELLE MARIE MCALHANEY
SUSAN MCALHANEY
LORI LYNN ESTRADA

and others, known and unknown to the Grand Jury, did combine, conspire, confederate, agree and have a tacit understanding with one another to commit offenses against the United States of America, to wit: violations of Title 21, United States Code, Section 841(a)(1), that is to intentionally and unlawfully possess with the intent to distribute and distribute in excess of 100 kilograms of marijuana and 500 grams of cocaine, Schedule I and II controlled substances.

OBJECTS OF THE CONSPIRACY

1. It was an object of the conspiracy to obtain multiple kilogram quantities of marijuana from the southwestern United States, particularly the State of Texas and to transport the marijuana to the Atlanta, Georgia area.

2. It was a further object of the conspiracy to obtain multiple-kilogram quantities of cocaine from southern Florida and to transport the cocaine to the Atlanta, Georgia area.

3. It was still a further object of the conspiracy to possess with the intent to distribute and to distribute quantities of marijuana and cocaine within the Northern District of Georgia, and elsewhere.

4. It was further an object of the conspiracy to travel in and use facilities of, and to cause others to travel in and use facilities of interstate commerce with the intent to promote, manage, and facilitate the promotion and management of an unlawful activity, that is: the distribution and possession with the intent to distribute marijuana and cocaine.

MANNER AND MEANS OF
THE CONSPIRACY

1. HERBERT STEVE BENEFIELD aided and assisted by JAMES NATHAN STUCKEY and others obtained multiple-kilogram quantities of marijuana imported into the United States from Mexico and other countries. TROY PAUL CRUMBLEY purchased from HERBERT STEVE BENEFIELD multiple-kilogram quantities of marijuana.

2. TROY PAUL CRUMBLEY supervised, managed and organized CATHERINE ANNE PARKER, LORI LYNN ESTRADA, MICHELLE MARIE MCALHANEY, SUSAN MCALHANEY and other women, who aided and assisted each other in traveling in interstate commerce from the Atlanta, Georgia area to Texas and elsewhere, and who obtained multiple-kilogram quantities of marijuana which they transported in private vehicles from the southwestern United States to the Atlanta, Georgia area. On their return to the Atlanta, Georgia

area the conspirators would aid and assist each other in weighing and packaging the marijuana in such quantities as they were directed by TROY PAUL CRUMBLEY.

3. TROY PAUL CRUMBLEY supervised, managed and organized the distribution of multiple-kilograms of marijuana within the Atlanta, Georgia area. JAMES HAROLD BLACKSTOCK, MICHAEL W. THOMAS, J. MICHAEL BARBER, a/k/a MIKE WAITS: and W.W. SPRINGER, a/k/a Butch and others distributed large quantities of marijuana by and on behalf of TROY PAUL CRUMBLEY.

4. FRANK MARVIN CRAFT, C. W. STALLINGS, STANLEY H. JONES and others obtained from TROY PAUL CRUMBLEY and associates of TROY PAUL CRUMBLEY large quantities of marijuana which they distributed within the Northern District of Georgia and elsewhere.

5. FRANK MARVIN CRAFT, obtained multiple-kilogram quantities of cocaine in the south Florida area which was subsequently transported to the Atlanta, Georgia area. TROY PAUL CRUMBLEY obtained large quantities of cocaine from FRANK MARVIN CRAFT and others. The cocaine was distributed within the Northern District of Georgia for TROY PAUL CRUMBLEY by MICHAEL W. THOMAS.

6. To aid and assist in the distribution of both marijuana and cocaine, TROY PAUL CRUMBLEY used properties he had previously acquired with proceeds from narcotics activities, including but not limited to his residence at 147 Lafayette Drive, Riverdale,

Georgia; the Conley Road Spur Station at 807 Conley Road, Atlanta, Georgia; Panama Package Liquor Store owned by Party Package, Inc. and located at 4841 Jonesboro Road, Forest Park, Georgia; and Desperado's, owned and operated by T. P. Crumbley and Associates, Inc. and located at 5025 Jonesboro Road, Forest Park, Georgia.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

That from on or about January, 1984, and continuously thereafter, up to and including the date of the return of this indictment, in the Northern District of Georgia and elsewhere, the defendant,

TROY PAUL CRUMBLEY,

knowingly, willfully, and intentionally did engage in a continuing criminal enterprise, in that he violated Title 21, United States Code, Sections 841, 846, 952, and 963 by doing, causing, facilitating, and aiding and abetting the importation, possession with intent to distribute, and distribution of marijuana, cocaine and methamphetamines; which violations were a part of a continuing series of violations undertaken by defendant, TROY PAUL CRUMBLEY in concert with at least five other persons with

respect to whom defendant, TROY PAUL CRUMBLEY occupied a position of organizer, a supervisory position, and any other position of management, and from which defendant, TROY PAUL CRUMBLEY obtained substantial income and resources.

In violation of Title 21, United States Code, Section 848.

COUNT THREE

That on or about the 8th day of August, 1985, in the Northern District of Georgia,

TROY PAUL CRUMBLEY

a resident of Riverdale, Georgia, did willfully make and subscribe a 1984 personal income tax return, Form 1040, by verifying by a written declaration that it was made under the penalties of perjury and which was filed with the Director, Internal Revenue Service Center, at Chamblee, Georgia, which said Form 1040, he did not believe to be true and correct as to every material matter in that the 1984 return reported adjusted gross income of \$14,391 from interest income, dividends, state income tax refunds, Troy's Package Store (a retail beer and liquor store), a laundry mat and car wash; whereas, as he then and there

well knew and believed, that he received substantial income from his activities as a drug trafficker in excess of that income reported on the return.

In violation of Title 26, United States Code, Section 7206(1).

COUNT FOUR

That on or about the 15th day of April, 1986, in the Northern District of Georgia,

TROY PAUL CRUMBLY

a resident of Riverdale, Georgia, did willfully make and subscribe a 1985 personal income tax return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which was filed with the Director, Internal Revenue Service Center, at Chamblee, Georgia, which said Form 1040, he did not believe to be true and correct as to every material matter in that the 1985 return reported adjusted gross income of \$4,593 from interest income, dividends and fully taxable pensions; whereas, as he then and there well knew and believed, that he received substantial income from his activities as a drug trafficker in excess of that income reported on the return.

In violation of Title 26, United States Code, Section 7206(1).

FORFEITURE PROVISIONS

1. Count One of this indictment charges defendant,

TROY PAUL CRUMBLEY

with a violation of Title 21, United States Code, Section 846 and upon conviction of that violation of the law, such convicted defendant shall forfeit to the United States (1) any property constituting or derived from any proceeds the person obtained, directly or indirectly, as the result of such violation, and (2) any of the person's property used or intended to be used, in any manner of part, to commit or to facilitate the commission of such violation; pursuant to Title 21, United States Code, Section 853.

2. Count Two of this indictment charges the defendant,

TROY PAUL CRUMBLEY

with engaging in a continuing criminal enterprise in violation of Title 21, United States Code, Section 848, and upon conviction, the defendant shall forfeit to the United States, in addition to any property described in paragraph 1 above, any of his interest in, claims against and property or contractual rights affording a source of control over the continuing criminal enterprise; pursuant to Title 21, United States Code, Section 853.

3. Such forfeitures shall include but are not limited to the following:

1. All that tract or parcel of land lying and being in Land Lot 197 of the 2nd District of Henry County, Georgia, being 9.27 acres per plat of Joe Rowan, Jr., Henry County Surveyor,

dated August 27, 1985.

2. All that tract or parcel of land lying and being in Land Lots 188, 189 and 197 of the 2nd District, Henry County, Georgia and being more particularly described as 33.41 acres as shown on a plat drawn by Joe Rowan, Jr., for Wiley Brown and dated July 13, 1985. Frontage is shown as being 963.54 feet on Peeksville Road.
3. All that tract or parcel of land lying and being in Land Lot 212 of the 12th District of Clayton County, Georgia, being 0.95 acres as shown on a plat of survey by Lewis Hurd Surveyors for Albert Wilkerson dated November 5, 1985.
4. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 219 of the 13th District of Fayette County, Georgia, and being Lot 24, Block A of Unit Three of La Fayette Estates Subdivision, as per plat recorded in Plat Book 7, Page 195, Fayette County Records; said property being located at 147 La Fayette Drive, Riverdale, Georgia.
5. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 5 of the 6th District of Clayton County, Georgia, being Lot 30 Block A, Section I as shown on a plat of Lake Spivey Estates, said plat being recorded in Plat Book 7, page 83, Clayton County Records; said location of property being 2520 Emerald Drive, Jonesboro, Clayton County, Georgia.
6. All that tract or parcel of land, together with buildings thereon, lying and being in Land Lot 32 of the 14th District of Fulton County, Georgia, containing 0.83 acres and designated "Parcel I" of a certain survey for Citizens and Southern National Bank by Delta Engineers and Surveyors, Inc., dated September 25, 1979; said location of property being 807 Conley Road, Atlanta, Fulton County, Georgia.
7. All that business, including cash, stocks and bonds, if any, and choses in action such as notes receivable, of "T.P.C., Inc.," represented by Troy Paul Crumbley to be a Georgia Corporation; said business shall include but not be limited to a) that downpayment of \$120,000.00 made by Woo Won Hwang and Young Soon Hwang for the purchase of that business known as the "Conley Road Spur Station" located at 807 Conley Road, Atlanta, Fulton County, Georgia; b) that promissory note executed on or about April 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$20,000 being due and payable to "T.P.C., Inc."; c) that promissory note executed on or about

July 20, 1987 by Woo Won Hwang and Young Soon Hwang for \$160,000.00, payable in monthly installments of \$2,114.00 beginning May 20, 1987; d) that "Security Agreement" executed by Woo Won Hwang and Young Soon Hwang dated April 20, 1987 securing the two promissory notes identified previously; said notes and security agreement being created as part and parcel of the sale by Troy Paul Crumbley, "President" of a purported Georgia corporation, known as "T.P.C., Inc.," of the business known as the "Conley Road Spur Station."

8. That chose in action identified by that promissory note executed on June 13, 1986 by Fritz Albrecht for the principal sum of \$10,000.00 together with interest due and payable to Troy Paul Crumbley.
9. All that personal property, both tangible and intangible, specifically including inventory, currency, equipment, accounts receivable, etc. of that business known as Panama Package Liquor Store owned and operated by Party Package, Inc., and located at 4841 Jonesboro Road, Forest Park, Fulton County, Georgia.
10. All that business enterprise owned and operated by T. P. Crumbley and Associates, Inc., doing business as Desparado's and located at 5025 Jonesboro Road, Forest Park, Georgia, said business shall include but not be limited to said stock of the corporation, as well as its assets including leaseholds, fixtures, licenses, accounts receivable, bank accounts, etc.

A

BILL.

Karlott R. Wilson
FOREPERSON

Robert L. Barr, Jr.
ROBERT L. BARR, JR.
UNITED STATES ATTORNEY
NORTHERN DISTRICT OF GEORGIA

Wilmer Parker, III
WILMER PARKER, III
ASSISTANT UNITED STATES ATTORNEY
SOUTHEASTERN DRUG TASK FORCE
GA BAR NUMBER 563550

ATTEST: A TRUE COPY
CERTIFIED THIS

NOV 4 1987

Luther D. Thomas, Clerk
By: Deputy Clerk
L. D. Thomas

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END

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